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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

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1 defendant Clifford Durham, the digital and/or paper media produced by the United States
2 to defense counsel, Mr. Ronald Tyler, shall be maintained in a locked, safe, and secure
3 drawer, cabinet, or safe which is accessible only to Mr. Tyler, members of his trial
4 preparation working with him to prepare Mr. Durham's defense, and his investigator.
5 Mr. Tyler, members of his trial preparation team, and the investigator shall not permit
6 any person access of any kind to the digital and/or paper media or information related to
7 child victims except as set forth below.

- 8 2. The following individuals may examine the digital and/or paper media for the sole
9 purpose of preparing the defense of defendant Clifford Durham and for no other purpose:
 - 10 a. Counsel for the defendant, Ronald Tyler;
 - 11 b. Persons employed by the Office of the Federal Public Defender who are assisting
12 with the preparation of Clifford Durham's defense;
 - 13 c. Defendant Clifford Durham, but only in the presence of his attorney;
 - 14 d. Any expert(s) retained on behalf of defendant Clifford Durham to assist in the
15 defense of this matter; and
 - 16 e. Any investigator(s) retained on behalf of defendant Clifford Durham to assist in
17 the defense of this matter.
- 18 3. A copy of this order shall be maintained with the digital and/or paper media at all times.
- 19 4. All individuals other than Mr. Tyler and Clifford Durham who receive access to the
20 materials pursuant to this Order, prior to receiving access to the materials, shall sign a
21 copy of this Order acknowledging that:
 - 22 a. They have reviewed the Order;
 - 23 b. They understand all its contents;
 - 24 c. They agree that they will only access the digital media for the purposes of
25 preparing a defense for defendant Clifford Durham;
 - 26 d. They will not make any copies of any image files within the digital media without
27 further order of the Court;
 - 28 e. They will not access the digital media from any computer that is connected to the

STIPULATION AND [PROPOSED] PROTECTIVE ORDER

1 Internet or to any local network; and

2 f. They understand that failure to abide by this Order may result in sanctions by this
3 Court and in state or federal criminal charges for possession or dissemination of
4 child pornography.

5 5. The orders referenced in paragraph 4 signed by persons employed by the Office of the
6 Federal Public Defender who are assisting with the preparation of Clifford Durham's
7 defense shall be maintained by the Federal Public Defender, Barry J. Portman, and shall
8 be available for review by the Court upon the Court's request.

9 6. With regard to all other orders signed pursuant to paragraph 4, counsel for Clifford
10 Durham, Mr. Tyler, shall promptly file signed copies of the Order, ex parte and under
11 seal. The United States shall have no access to these signed copies without further order
12 of the District Court.

13 7. No other person may be allowed to examine the material without further court order.
14 Examination of the digital and/or paper media shall be done in a secure environment
15 which will not expose the materials to other individuals not listed above.

16 8. No copies of any image files contained in the digital and/or paper media may be made
17 without further court order. The prohibition on copying includes (1) printing out images
18 onto paper or film and (2) duplicating the images in any digital format. Non-image files
19 such as word processing files, e-mails, and other text files may be duplicated to the extent
20 necessary to prepare the defense of this matter.

21 9. The computer from which the digital media will be accessed shall not be connected to the
22 Internet or to any other computer network.

23 10. Any pleadings that include or make reference to the above-described materials or their
24 contents shall be filed under seal.

25 11. Within five court days of the judgement and sentencing hearing in this matter, all
26 material provided to defense counsel pursuant to this Order, and all other authorized
27 copies, if any, shall be returned to the United States. The United States shall destroy
28 them. If defendant believes that he must maintain the material for any reasons related to

1 appeal, defendant must seek authorization from the District Court within five days of the
2 sentencing and judgment in this matter.

3
4 SO STIPULATED:

5 KEVIN V. RYAN
6 United States Attorney

7 Dated: 6/8/06

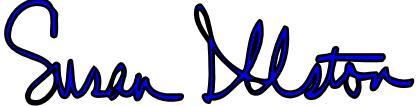
8 By: /s/
9 MICHELLE MORGAN-KELLY
10 Assistant United States Attorney

11 Dated: 6/28/06

12 /s/
13 RONALD TYLER
14 Attorney for Defendant

15 IT IS SO ORDERED that disclosure of the above-described discovery materials shall be
16 restricted as set forth above.

17 Dated: _____

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19 SUSAN ILLSTON
20 United States District Court Judge

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